

----- Forwarded message -----

From: **Sosha Furman** <sosha@kafene.com>

Date: Thu, Jun 23, 2022 at 8:08 AM

Subject: Re: Personal Matter for Debra Creighton

To: Debra Creighton <roar19812001@gmail.com>

Hi Debra,

Confirmed I have received your email and thank you for bringing it to my attention.

I will be in touch with next steps .

On Jun 22, 2022, at 1:52 PM, Debra Creighton <roar19812001@gmail.com> wrote:

Sosha,

I am sending you a copy of the attached so that you will have the opportunity to see more information about some concerns that I have about my work environment. It is my hope that this information may allow you to better correct the issues I am reporting to the EEOC. I appreciate your attention to these matters.

Respectfully,

Debra Creighton

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented to: Agency(ies) Charge No(s): <input checked="" type="checkbox"/> FEPA 510-2022-05678 <input checked="" type="checkbox"/> EEOC
Florida Commission on Human Relations and EEOC <small>State or local Agency, if any</small>		
Name (Indicate Mr., Ms., Mrs.) Debra Creighton	Home Phone (Ind. Area Code) 766-222-1449	Date of Birth 09/20/1981
Street Address City, State and ZIP Code 1783 North Croton Road Avon Park, Florida 33825		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)		
Name Kafene, Inc.	No. Employees, Members 15+	Phone No. (Include Area Code) 917-612-0912
Street Address City, State and ZIP Code 377 PARK AVENUE SOUTH, 7TH FLOOR, NEW YORK, NY 10016		
Name JUSTWORKS EMPLOYMENT GROUP LLC	No. Employees, Members 15+	Phone No. (Include Area Code) 917-612-0912
Street Address City, State and ZIP Code 55 Water Street, 29th Floor, New York, NY 10041		
DISCRIMINATION BASED ON (Check appropriate boxes)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest January 2022 Ongoing as of 6/8/22
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below)		<input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE: I am employed by Kafene, Inc. and I believe that Justworks Employment Group, LLC, the entity that serves as a PEO for Kafene, Inc., may qualify as a joint employer with Kafene, Inc. I began my employment with Kafene, Inc. in January 2022 as an area sales manager. I am based out of Avon Park, Florida, and serve the Florida market. At the start of my employment, I was informed that my sales territory would be exclusively available to me. However, that has not held true, as several males have encroached on my territory and, as a result, taken sales opportunities away from me. This has resulted in decreased sales numbers to me, as well as lower pay. I believe that I am being discriminated against on the basis of my sex, female, as Kafene, Inc. has permitted similarly situated male employees to violate these sales policies without reprisal, while prohibiting me and other females from seeking sales in territories assigned to male employees. I have reported my concerns about the ongoing discriminatory conduct up the chain-of-command several times and, each time, my reports and objections were ignored and/or dismissed. I believe that I am being retaliated against for this protected conduct by having my sales opportunities diminished and possibly being set-up for termination. I believe the Respondent(s) violated the Florida Civil Rights Act of 1992, Title VII of the Civil Rights Act of 1964, as amended, and the Equal Pay Act of 1963.		
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements.
I declare under penalty of perjury that the above is true and correct. 06 / 08 / 2022  Date Charging Party Signature		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINING PARTY SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

Please contact via counsel of record: Shaina Thorpe, ThorpeLaw, P.A. 1228 E. 7th Ave. Ste. 200, Tampa, FL 33605 Tel: (813) 400-0229; Fax (813) 944-5223; Email: shaina@thorpelaw.net

EEOC-MDO
Received 06/09/2022

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To:

Page: 3 of 3

2022-06-09 15:20:25 GMT

18139445223 (Thorpe & Thorpe, P

From: Thorpe Law P.A.

EEOC Form 5 (5-01)		Charge Presented to: Agency(ies) Charge No(s):	
CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		<input checked="" type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 510-2022-05677	
<u>Florida Commission on Human Relations and EEOC</u> <small>State or local Agency, if any</small>			
Name (Indicate Mr., Ms., Mrs.): Debra Creighton		Home Phone (Incl. Area Code): 786-222-1449	Date of Birth: 09/20/1981
Street Address: 1783 North Croton Road		City, State and ZIP Code: Avon Park, Florida 33825	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name: Kafene, Inc.		No. Employees, Members: 15+	Phone No. (Include Area Code): 917-612-0912
Street Address: 377 PARK AVENUE SOUTH, 7TH FLOOR, NEW YORK, NY 10016		City, State and ZIP Code: NEW YORK, NY 10016	
Name: JUSTWORKS EMPLOYMENT GROUP LLC		No. Employees, Members: 15+	Phone No. (Include Area Code): 917-612-0912
Street Address: 55 Water Street, 28th Floor, New York, NY 10041		City, State and ZIP Code: NEW YORK, NY 10041	
DISCRIMINATION BASED ON (Check appropriate box(es).)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest	
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN		January 2022 Ongoing as of 6/8/22	
<input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below.)		<input checked="" type="checkbox"/> CONTINUING ACTION	
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I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
06 / 08 / 2022		SIGNATURE OF COMPLAINING PARTY	
			
Date: Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

Please contact via counsel of record: Shaina Thorpe, ThorpeLaw, P.A. 1228 E. 7th Ave. Ste. 200, Tampa, FL 33605 Tel: (813) 400-0229; Fax (813) 944-5223; Email: shaina@thorpelaw.net

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